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ORIGINAL

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of Pennsylvania, PAUL B. AMBROSE, JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs,

v.

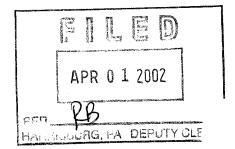
KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration,

Defendants,

and

BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania, Intervenor CIVIL ACTION NO. 1:CV-01-0910

(Judge Rambo) 🗸



EXHIBITS TO INTERVENOR'S REPLY TO PLAINTIFFS' ANSWER IN OPPOSITION TO THE MOTION FOR RECONSIDERATION OF THE COURT'S MARCH 1, 2002 ORDER

- 1. Exhibit A Internet E-Mail Using Softswitch and Open Addressing Manual.
- 2. Declaration of John Bachman.
- 3. Declaration of Colleen M. Brown, P.E.

- 4. Declaration of Michael S. Gillespie, P.E.
- 5. Declaration of Larry M. King.
- 6. Declaration of Christie Perry
- 7. Declaration of John L. Rautzahn, P.E.
- 8. Declaration of Michael M. Ryan, P.E.
- 9. Declaration of Jay W. Smith, P.E.
- 10. Declaration of Jeffrey P. Weaver, P.E.
- 11. Declaration of Antonia C. Zawisa.

Pennsylvania Department of Transportation



Internet E-Mail
Using Softswitch and
Open Addressing

Exhibit 1"

Softswitch is a software product that allows authorized users to send and receive electronic mail from Office Vision to Internet users. No attachments, files, or graphics can be sent, notes only. Softswitch authorization can be obtained by contacting the Bureau of Information Systems, User Services Unit. Internet access is not required to use Softswitch.

Two methods of sending Internet E-Mail

1. Open Addressing Method

The Open Addressing method must be used when an Internet user is not registered through Softswitch. Once the message has been sent and the recipient has replied they are registered. Please note the user ID assigned by Softswitch, this is the address you need for the registered method.

2. Registered Method

Once an Internet user is registered by Softswitch the registered method is used to correspond. The user ID assigned by Softswitch and Inetmail will be the address for correspondence.

USERID@PENNDOT.STATE.PA.US will be all PennDot employees E-Mail address. USERID will represent your current racf userid.

To send Internet E-Mail using Softswitch

Logon to CICS

OFFICE VISION/MVS Main Menu

Select

OPTION 1.

PERSONAL SERVICES MENU



MPS

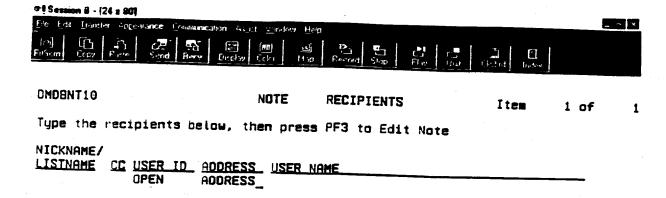
PERSONAL SERVICES

Type an option number or a fast-path command, then press ENTER

Maii	Work with in-basket items
Notes	Create notes (December 1)
·	Create notes (Recommendation: 11 or fewer recipients) Create messages (Unlimited recipients)
	Create documents (Unlimited recipients)
	Work with file cabinet items
	Find documents stored in the library
	Work with status information
Patterne	Work with directory
	Work with patterns
	Work with user defaults
oe regate	Work with Personal Services as delegate
	Notes Messages Documents File Cabinet Stored Documents Status Shared Address Book Patterns User Defaults

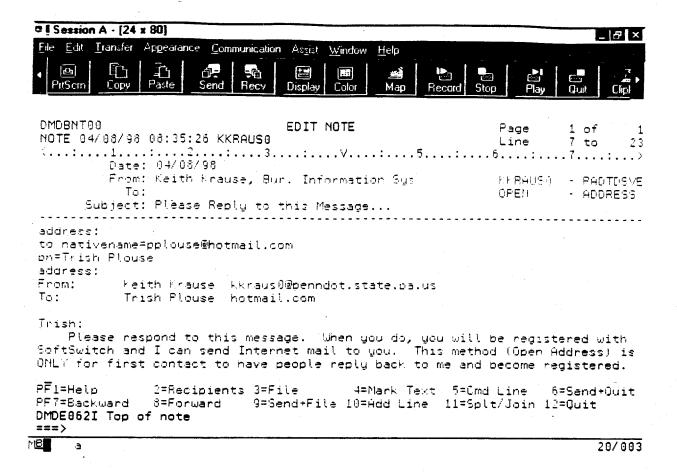
PF1=Help PF7=	2≃Exit 8=	3= 9 ≈P rint	4 =Ha in M enu 10=	5= 11=	6=Fast Path 12=Quit
===> Z_					
MB b					24/968

From the Personal Services main menu, select 2 for Note. Press Enter.



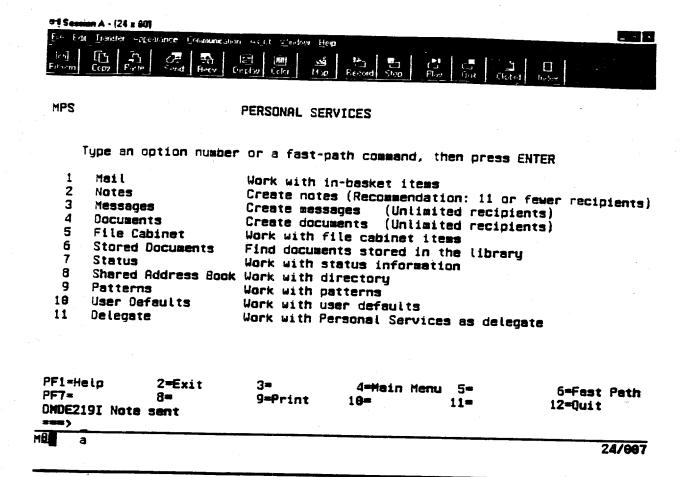
Before you can send mail to an Internet user, the user must be registered. A user is registered when they send you mail first. SoftSwitch will add their name and Internet ID to a list of other registered users Once a user is registered, anyone with Internet mail access can send to him. However, if this is not possible, you can send a user mail the first time by sending it in Open Address mode. It would be wise to include in your correspondence a line asking for the recipient to reply back, thus registering him with SoftSwitch. Open Address mode will be explained below.

Under User ID type OPEN and under Address type ADDRESS. This will allow you to send mail in the Open Address mode. Use this mode ONLY when the recipient has not yet sent you mail. Press F3 to create the note.

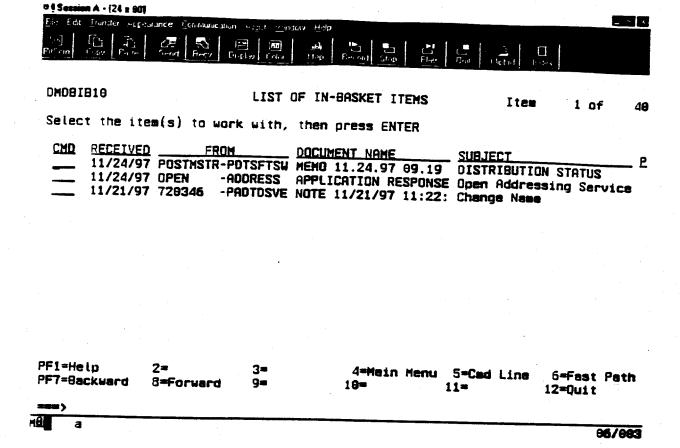


This is the way you would send the mail through Open Addressing. The first line of text MUST read address: This tells Softswitch that the Internet address follows. The next line MUST read to nativename = This is where you will type in the persons Internet E-Mail address from their business card or stationary. Note that after nativename there are NO SPACES! You MUST type in the Internet E-Mail address **EXACTLY** as it is shown on the business card or letterhead. **ANY** mistakes will make this message undeliverable. The next line MUST read pn = This stands for personal name and you MUST type in ONLY 2 names here. Softswitch is looking for a FIRST NAME and a LAST NAME ONLY! Do NOT use Mr, Mrs, or Ms, or any other title. The next line MUST read address: This tells Softswitch that this is the end of the Internet address.

Now you can type the message you want to send. It's a good idea to include in your message your name and location since SoftSwitch will NOT put these in for you. When you are finished, press the F6 or F9 key to send the mail as you normally would.



This will give you the *Personal Services* screen you are used to seeing. Next, you will get confirmation in your mailbox that your mail has been sent. This confirmation can take anywhere from a few minutes to a few hours, depending on how many people are using the Internet, Mainframe activity, etc. This is shown on the next page.



When you send mail using *Open Addressing*, you will receive confirmation that your mail was sent. Note the 2 new pieces of mail shown above. After you read these, you may delete them.

DMDBIB10 LIST OF IN-BASKET ITEMS Select the item(s) to work with, then press ENTER

Itam

1 of

12/30/97 KKRAUSO -PADTDS 12/24/97 BSHIRLEY-INETMA 12/23/97 KKRAUSO -PADTDS 12/23/97 MAHONEY -PADTDS 12/19/97 710721 -PADTDS 12/18/97 MOOREJE -PADTDS PF1=Help 2= 3:	IVE NOTE 10/22/97 11:04: IVE NOTE 10/22/97 11:04: IVE NOTE 10/22/97 11:04: IVE NOTE 10/22/97 11:04: IVE NOTE 12/22/97 11:04: IVE NOTE 12/22/97 11:04: IVE NOTE 10/22/97 11:04: IVE NOTE 12/18/97 11:00: VE NOTE 12/18/97 11:00: 4-Main Menu	CICS ID CHANGOVER CICS ID CHANGOVER CICS ID CHANGOVER CICS ID CHANGOVER Seasons Greetings CICS ID CHANGOVER BUILDING NEWSLETTER CICS ID CHANGOVER
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_

DMDBIB23 DESCRIPTION OF NOTE Document name: APPLICATION RESPONSE

IN IN-BASKET

Subject..... Open Addressing Service Report

Author..... ADDRESS.OPEN Class....:

Doctype....: NOTE

Received from....: OPEN - Address

Received...... 01/06/98 11:01

Sent..... 01/06/98 09:55

Type an option number or fast path command, then press ENTER

3 Send 4 Send with Note 8 Reply 9 File 10 Delete

5 Print 20 Reply with message

7 Stora 22 Export

PF1=Help 2= 8=

3= 9=

4=Main Menu 5=Cmd Line 6=Fast Pa 10=Options 11=

12=Quit

DMDE032I Press PF10 for additional options

DATE: 01/06/98

FROM: ADDRESS.OPEN

TO: PENNDOT - PLOUSE *PLOUSE, PATTI SUBJECT: Open Addressing Service Report

THE FOLLOWING ADDRESS WAS PROCESSED:

DOCUMENT FORWARDED TO 1 IN-LINE RECIPIENT (S).

PF1=Help 2= 3= PF7=Backward 8=FOIWEIG 9=

4=Main Menu 5=Cmd Line 10= 11=

6=Fast Path 12=Quit

D

The above screens will appear when viewing the OPEN ADDRESS message

DMDBIB10 LIST OF IN-BASKET ITEMS Select the item(s) to work with, then press ENTER

22#>

Item

1 of

01/05/98 01/05/98 01/05/98 12/31/97 12/30/97 12/30/97 12/30/97 12/30/97 12/24/97 12/23/97 12/23/97 12/23/97 12/219/97	GINGRIC - PADTDSVE SHIRLEY - PADTDSVE KKRAUSO - PADTDSVE BSHIRLEY - INETMAIL KKRAUSO - PADTDSVE MAHONEY - PADTDSVE MAHONEY - PADTDSVE MOOREJE - PADTDSVE	NOTE 01/05/98 07:22: SAB.RFT NOTE 12/22/97 11:04: NOTE 12/22/97 11:04: NOTE 10/22/97 11:04: NOTE 10/22/97 11:04: NOTE 10/22/97 11:04: MEMO 12.24.97 06.49 NOTE 12/22/97 11:04: NEWSLTR.RFT NOTE 10/22/97 11:04: NEWSLTR.RFT NOTE 10/22/97 11:04: NOTE 12/18/97 11:00: 4=Main Menu	Open Addressing Service CICS ID CHANGOVER WordPerfect 7.0 Basic C SAB instructions CICS ID CHANGOVER BUILDING CHANGOVER BUILDING NEWSLETTER CICS ID CHANGOVER Van run announcement fo 5=Cmd Line 6=Fast Pati
DIBMADBE-134	s=rorward 9=	10=	11= 12=Quit

MDBIB23 DESCRIPTION OF NOTE Document name...: MEMO 01.06.98 09.57 Subject..... DISTRIBUTION STATUS

IN IN-BASKET

Author....: Postmaster

Class....: Doctype....: NOTE

Received from....: POSTMSTR-PDTSFTSW

Received..... 01/06/98 11:01

Sent.....: 01/06/98 09:57

Type an option number or fast path command, then press ENTER

1 View 3 Send 4 Send with Note 7 Store 8 Reply 9 File 10 Delete 20 Reply with message 22 Export

PF1=Help 2= 3= 4=Main Menu 5=Cmd Line 6=Past Pat P!7= 8= 9= 10=Options 11= 12=Quit

DMDE032I Press PF10 for additional options

VIEW NOTE Balle 1 00

DATE: 01/06/98

FROM: .

TO: PENNDOT - PLOUSE *PLOUSE, PATTI

SUBJECT: DISTRIBUTION STATUS

DISTRIBUTION STATUS INFORMATION PADTDSVE.PLOUSE 01/06/98 09:57:00

DISTRIBUTION ID: PADTDSVE.PLOUSE.0011

SUBJECT

: testing

DOCUMENT NAME : NOTE 01/06/98 09:53:16 PLOUSE

DATE SENT : 01/06/98 TIME SENT: 09:55:39

YOUR MAIL WAS SUCCESSFULLY DELIVERED.

PF1=Help

3= 9=

4=Main Menu 5=Cmd Line 10=

11=

6=Fast Pat 12=Quit

PF7=Backward 8=Forward DMDE0621 Top of note

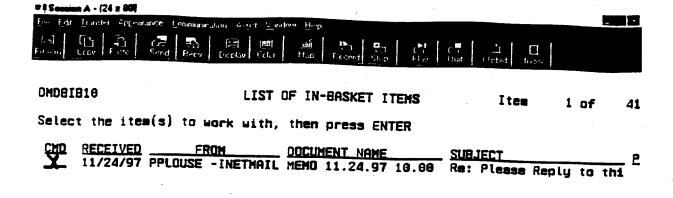
The message "Your mail was successfully delivered " Means the message was sent to the receiving destination successfully

PennDot cannot guarantee the delivery of E-Mail once it is in the Internet. Any error message received should be evaluated, addresses verified, checked for spelling, and resubmitted.

PF1=Help 2= 3= 4=Main Menu 5=Cmd Line 6=Fast Path PF7=Backward 8=Forward 9= 10= 11= 12=Quit D

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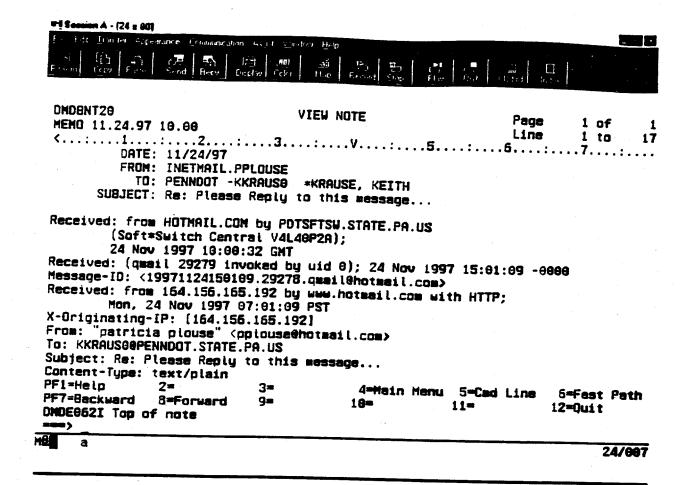
The above screens will appear when viewing the POSTMASTER OPEN ADDRESS message



PF1=Help PF7=Backward	2= 8 = Forward	3 ≈	4≈Main Menu 10=	5=Cad Line 11=	6=Fast Path 12=Quit
****				•	
нв а					96/993

When the person replies back to you, Softswitch will deliver the mail just as you are used to seeing it through OfficeVision. Make a note of the persons ID and Address. This is the ID and address you will use to send Internet mail to this person in the future. As was mentioned before, *Open Addressing* is ONLY used to get the person to respond the first time.

The above screen and following page will appear when the OPEN ADDRESS recipient responses to your message



This is the header on Internet mail coming into PennDOT. Notice at the top the address is first and the User ID is last. Remember, this is the mail ID and address you will need to use to send Internet mail to this person in the future. All the other information is added by the senders Internet mail provider.

Pennsylvania Department of Transportation



Internet E-Mail Using Softswitch and Registered Users To send Internet E-Mail using Softswitch

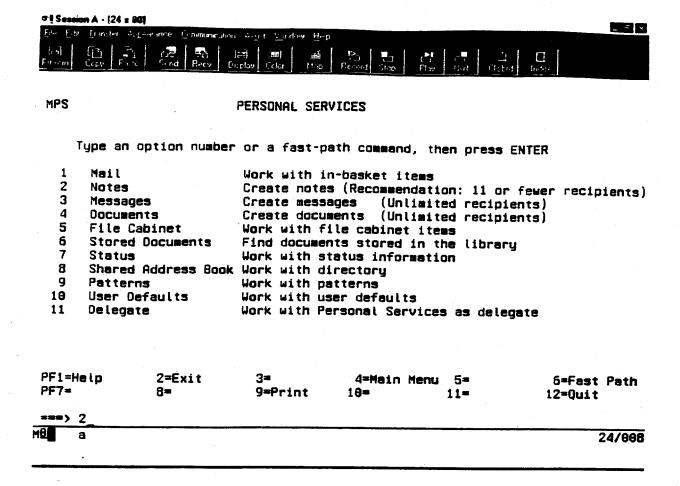
Logon to CICS

OFFICE VISION/MVS Main Menu

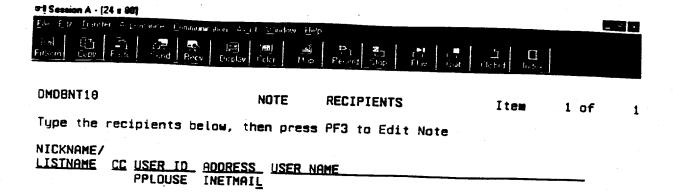
Select

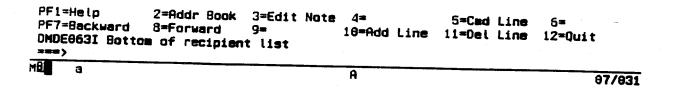
OPTION 1.

PERSONAL SERVICES MENU

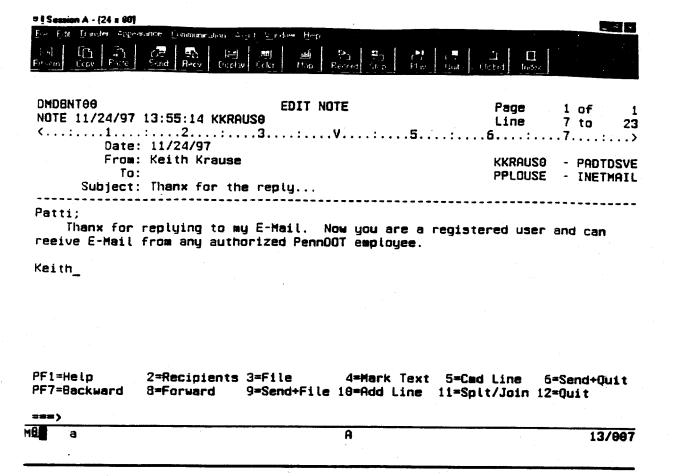


Sending Internet mail to Registered Users is easier than using the Open Address method. Once someone sends mail to you, they are registered in the Softswitch registry. When this happens, anyone with Internet Mail authorization can send Internet mail to this person.



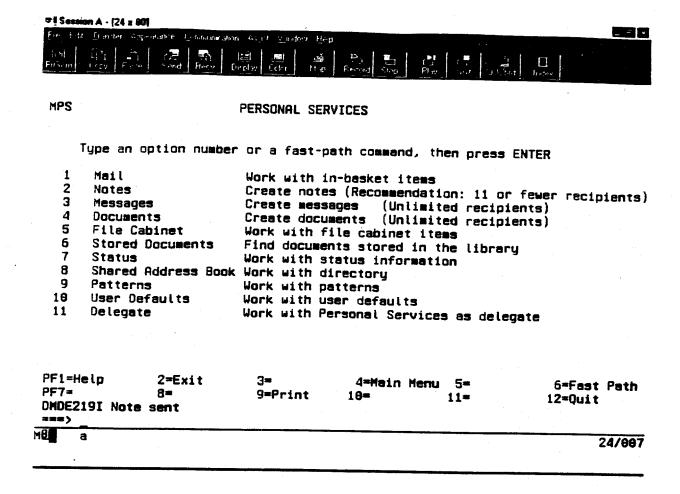


This is where you will enter the user ID that Softswitch assigned to your correspondent when they replied to your message. This ID is usually the same as their regular Internet E-mail ID but not always. So, it is very important when someone replies to your E-mail that you make a note of their returning E-mail ID and address. The address here will always be INETMAIL. Press the F3 key to edit the note.



Here is a copy of the note I am sending. Note the ID and address on the T0: line. This is the ID assigned by Softswitch to this particular user. The Address is always INETMAIL when sending E-Mail to a registered user. Anyone who is an authorized OfficeVision user can send E-Mail to this person by using this ID and Address.

When you are finished, press the F6 or F9 key to send the mail as you normally would.



This will give you the *Personal Services* screen you are used to seeing. SoftSwitch will now take your message and send it on it's way. You can now go back and send more messages or complete your daily tasks.

MPS .

ERSONAL SERVICES

Type an option number or a fast-path command, then press ENTER

1	Mail	Work with in-basket items Create notes (Recommendation: 11 or fewer recipients
3 4 5 6 7	Notes Messages Documents File Cabinet Stored Documents Status	Create messages (Unlimited recipients) Create documents (Unlimited recipients) Work with file cabinet items Find documents stored in the library Work with status information
8 9 10 11	Shared Address Book Patterns User Defaults Delegate	Work with directory Work with patterns Work with user defaults Work with Personal Services as delegate

PF1=Help	2=Exit	3=	4=Main N	Menu 5=	6=Fast Path
PF1=nelp PF7=	8=	9=Print	10=	11=	12=Quit

===> 2

DMDBNT10

NOTE

RECIPIENTS

Item - 1 of

Type the recipients below, then press PF3 to Edit Note

NICKNAME/

LISTNAME

CC USER ID ADDRESS USER NAME address

Case 1.01-cv-00910-C	CC Document oo	1 11 0 0 04/0 1/2002	1 age 21 01 00	· · · · · · · · · · · · · · · · · · ·
DMDBNT00 NOTE 11/13/98 10:33:58 <:2	EDIT NOT		Page Line	1 of 7 to 23
Date: 11/13/98 From: Doris Wi To: Subject: please r	lliams		WILLDOR OPEN	- PADTDSVE - ADDRESS
address: to nativename=sumpman@p pn=mary sumpman address: from: doris williams to: mary sumpman	willdor@penndot.s sumpman@penndot.s	state.pa.us		

mary: this is a test of the emergency broadcast system. don't touch that dial or you will get soapy!!!

PF1=Help 2=Recipients 3=File 4=Mark Text 5=Cmd Line 6=Send+Quit PF7=Backward 8=Forward 9=Send+File 10=Add Line 11=Splt/Join 12=Quit DMDE062I Top of note ===>

[F6]

MPS

ERSONAL SERVICES

3=

9=Print

Type an option number or a fast-path command, then press ENTER

1	Mail	Work with in-basket items
	Notes	Create notes (Recommendation: 11 or fewer recipients)
_	Meggages	Create messages (Unlimited recipients)
ے 4	Documents	Create documents (Unlimited recipients)
_	File Cabinet	Work with file cabinet items
5	Stored Documents	Find documents stored in the library
6		Work with status information
7	Status	Work with directory
8		Work with patterns
9	Patterns	Work with user defaults
10	User Defaults	Work with Personal Services as delegate
11	Delegate	MOLY ATCH LCIPOHAT DOTITION OF THE TOTAL

10=

PF1=Help 2=Exit PF7= 8= DMDE219I Note sent

4=Main Menu 5=

[F4]

11=

6=Fast Path

12=Quit

OfficeVision/MVS Main Menu

Type an option number or a fast-path command, then press ENTER

1 Personal Services Mail, Notes, Messages, Documents, File Cabinet, Address Book, Delegate

2 Calendar Appointments, Resources, Telephone Messages, Distribution Lists, Address Book, Holidays

3 Bulletin Board Training, FAX#, WordPerfect Support, Mainframe Activities, Benefits and Other Employee Info

4 Shared Address Book PADOT Employees Directory, Nicknames, Personal (SAB) Address Book, Distribution Lists

PF1=Help PF7= 2=Exit 8= 3= 9=Print 4= 10= 5= 11= 6=Fast Path 12=Quit

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OfficeVision/MVS Main Menu

Type an option number or a fast-path command, then press ENTER

1	Personal	Services	Mail,	Notes,	Messag	jes,	Documents,	File
			Cabine	et, Add	ress Bo	ok,	Delegate	

- 2 Calendar Appointments, Resources, Telephone Messages, Distribution Lists, Address Book, Holidays
- 3 Bulletin Board Training, FAX#, WordPerfect Support, Mainframe Activities, Benefits and Other Employee Info
- 4 Shared Address Book PADOT Employees Directory, Nicknames, Personal (SAB) Address Book, Distribution Lists

PF1=Help 2=Exit 3= 4= 5= 6=Fast Pat:
PF7= 8= 9=Print 10= 11= 12=Quit

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PERSONAL SERVICES

3=

9=Print

Type an option number or a fast-path command, then press ENTER

)	
·	1	Mail	Work with in-basket items
		Notes	Create notes (Recommendation: 11 or fewer recipients
	3	Messages	Create messages (Unlimited recipients)
	4	Documents	Create documents (Unlimited recipients)
	5	File Cabinet	Work with file cabinet items
	6	Stored Documents	Find documents stored in the library
	7	Status	Work with status information
	8	Shared Address Book	Work with directory
	9	Patterns	Work with patterns
1	.0	User Defaults	Work with user defaults
1	.1	Delegate	Work with Personal Services as delegate

2=Exit PF1=Help PF7≕ DMDE219I Note sent

MPS .

4=Main Menu 5= 10= 11= 10=

6=Fast 12=Quit 6=Fast Pat

; DMDB*IB10

LIST OF IN-BASKET ITEMS

Item

1 of

Select the item(s) to work with, then press ENTER

CMD	RECEIVED		DOCUMENT NAME	SUBJECT
X	11/13/98		APPLICATION RESPONSE	Open Addressing Service
	11/13/98	OPEN -ADDRESS	APPLICATION RESPONSE	Open Addressing Service
	11/12/98	FULKIRE -PADTDSVE	TEAM FACILITATION	
		FULKIRE -PADTDSVE		There are 4 seats left
	11/12/98	BRUNNEL -PADTDSVE	NOTE 11/12/98 14:38:	Speakers Subcommittee
	11/12/98	CALENDAR-*	APTRES 11/12/98 13:1	NLWELSH /Meeting
	11/12/98	NLWELSH - PADTDSVE	NOTE 11/12/98 12:53:	MEETING
		CALENDAR - *	APTNEW 11/12/98 12:5	
	11/12/98	MSTEELE -PADTDSVE	FORWARD 11/12/98 09:	, , ,
		MSTEELE -PADTDSVE		

DMDB1B23

DESCRIPTION OF NOTE

IN IN-BASKET

Document name....: APPLICATION RESPONSE

Subject..... Open Addressing Service Report

Author..... ADDRESS.OPEN Class.....:

Doctype....: NOTE

Received from....: OPEN -ADDRESS

Received.....: 11/13/98 10:27 Sent....: 11/13/98 10:27

Type an option number or fast path command, then press ENTER

1 View 3 Send 4 Send with Note 5 Print 7 Store 8 Reply 9 File 10 Delete 20 Reply with message 22 Export

PF1=Help 2= 3= 4=Main Menu 5=Cmd Line 6=Fast Path

PF7= 8= 9= 10=Options 11= 12=Quit

DMDE032I Press PF10 for additional options

===>

DATE: 11/13/98
FROM: ADDRESS.OPEN

TO: PENNDOT -WILLDOR *WILLIAMS, DORIS

SUBJECT: Open Addressing Service Report

THE FOLLOWING ADDRESS WAS PROCESSED:

DOCUMENT FORWARDED TO 1 IN-LINE RECIPIENT(S).

PF1=Help 2= 3= 4=Main Menu 5=Cmd Line 6=Fast Path PF7=Backward 8=Forward 9= 10= 11= 12=Quit

===>

DMDB1B10

LIST OF IN-BASKET ITEMS

Item

1 of

'Select the item(s) to work with, then press ENTER

CMD	RECEIVED	FROM	DOCUMENT NAME	SUBJECT
1/	11/13/98	POSTMSTR-PDTSFTSW	MEMO 11.13.98 10.28	DISTRIBUTION STATUS
r	11/13/98	OPEN -ADDRESS	APPLICATION RESPONSE	Open Addressing Service
	11/13/98	OPEN -ADDRESS	APPLICATION RESPONSE	Open Addressing Service
	11/12/98	FULKIRE -PADTDSVE	TEAM FACILITATION	
	11/12/98	FULKIRE -PADTDSVE	**MESSAGE**	There are 4 seats left
	11/12/98	BRUNNEL -PADTDSVE	NOTE 11/12/98 14:38:	Speakers Subcommittee
	11/12/98	CALENDAR-*	APTRES 11/12/98 13:1	NLWELSH /Meeting
	11/12/98	NLWELSH -PADTDSVE	NOTE 11/12/98 12:53:	MEETING
	11/12/98	CALENDAR - *	APTNEW 11/12/98 12:5	NLWELSH /Meeting
	11/12/98	MSTEELE -PADTDSVE	FORWARD 11/12/98 09:	

DATE: 11/13/98

FROM: .

TO: PENNDOT -WILLDOR *WILLIAMS, DORIS

SUBJECT: DISTRIBUTION STATUS

PADTDSVE.WILLDOR DISTRIBUTION STATUS INFORMATION 11/13/98 10:28:00

DISTRIBUTION ID: PADTDSVE.WILLDOR.0018

SUBJECT : PLEASE REPLY

DOCUMENT NAME : NOTE 11/13/98 10:25:15 WILLDOR

DATE SENT : 11/13/98 TIME SENT: 10:27:06

YOUR MAIL WAS SUCCESSFULLY DELIVERED.

PF1=Help 2= 3= 4=Main Menu 5=Cmd Line 6=Fast Path

M

PF7=Backward 8=Forward 9= 10= 11= 12=Quit

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DMDB1B10

LIST OF IN-BASKET ITEMS

Item

1 of 110

Select the item(s) to work with, then press ENTER

CMD	RECEIVED		DOCUMENT NAME REPLY 11/13/98 10:30	SUBJECT
_	11/13/98	CWBROWN - PENNDOT	•	PICADE REFUI
	11/13/98	POSTMSTR-PDTSFTSW	MEMO 11.13.98 10.28	DISTRIBUTION STATOS
	11/13/98	OPEN -ADDRESS	APPLICATION RESPONSE	Open Addressing Service
	11/13/98	OPEN -ADDRESS	APPLICATION RESPONSE	Open Addressing Service
	11/12/98	FULKIRE -PADTDSVE	TEAM FACILITATION	
	11/12/98	FIT.KIRE - PADTDSVE	**MESSAGE**	There are 4 seats left
	11/12/98	BRIMNET, - PADTDSVE	NOTE 11/12/98 14:38:	Speakers Subcommittee
	11/12/98	CALENDAR - *	APTRES 11/12/98 13:1	NLWELSH /Meeting
	11/12/00	MINET OH _ DADTDSVE	NOTE 11/12/98 12:53:	MEETING
	11/12/30	MIMERSH - FADIDOVE	APTNEW 11/12/98 12:5	MIWELSH /Meeting
	11/12/98	CALENDAR-*	APINEW 11/12/90 12:5	MEMBERST / MCCCTING

MDBNT20	***	EW NOTE	Page	1 of
	10:30:09 CWBROWN		Line	1 to
	10:30:09 CWBROWN	:		, . ,
	11/13/98 PENNDOT.CWBROWN			
		WILLIAMS, DORIS		
	PLEASE REPLY			
Reference:	Your note of 11/13/	98 10:28		
ou are so cor				
you are so seen				

PF1=Help 2= 3= 4=Main Menu 5=Cmd Line 6=Fast Path PF7=Backward 8=Forward 9= 10= 11= 12=Quit

===>

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. : Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS (Judge Rambo) A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs, v. KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration, Defendants, and BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania,

DECLARATION OF JOHN BACHMAN

John Bachman, declares and says:

Intervenor

1. I am presently a Highway Design Manager for the Pennsylvania Department of Transportation's District 8-0 office. I have held this position since the fall of 1999.

Exhibitz"

- 2. As Highway Design Manager, I manage projects designed by consultants. The I-81 Interchange project is one of these projects. I also supervise 3 project Managers and their supporting staff.
- 3. Prior to the fall of 1999, I did not have an active role in the I-81 Interchange project.
- 4. I have never used the CICS e-mail system for any project.
- 5. I have never directed any of my staff to send any emails on the CICS e-mail system on my behalf for the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this and day of March, 2002.

John Bachman

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS (Judge Rambo) A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs, v. KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration,

Defendants,

and

BRADLEY L. MALLORY, Secretary for : The Department of Transportation, : Commonwealth of Pennsylvania, : Intervenor :

DECLARATION OF COLLEEN M. BROWN, P.E.

Colleen M. Brown, P.E., declares and says:

1. I am a Project Development Engineer for the Highway Quality Assurance Division of the Pennsylvania Department of Transportation's Bureau of Design. I have held this position since Fall of 1997.

Exh. 31

- 2. As the Project Development Engineer, my responsibilities with respect to the I-81 Interchange project included: the review of environmental documents and the preliminary design and coordination activities between FHWA and the Department.
- 3. I have never used the CICS e-mail system for any project.
- 4. I have never directed any of my staff to send any emails on the CICS e-mail system on my behalf for the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this 22nd day of March, 2002.

Colleen M. Brown, P.E.

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS : (Judge Rambo) A. WARNOCK, U.X. VAGNERINI, THOMAS : W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs, v. KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration, Defendants, and BRADLEY L. MALLORY, Secretary for The Department of Transportation,

DECLARATION OF MICHAEL S. GILLESPIE, P.E.

Michael S. Gillespie, P.E., declares and says:

Commonwealth of Pennsylvania,

Intervenor

1. I am the Portfolio Manager for Design for the Pennsylvania Department of Transportation's District 8-0. I have held this position since October 30, 1999.

18th. 4"

- 2. As the Portfolio Manager for Design, my responsibilities with respect to the I-81 Interchange project included: updating the project schedule on a quarterly basis in regularly scheduled District project status meetings.
- 3. From July, 1999 to October 30, 1999, I was the District Design Services Engineer and I also acted part-time as the Assistant District Engineer for Design on a rotational basis with Jeffrey P. Weaver, P.E.
- 4. As the District Design Services Engineer and part-time Assistant District Engineer for Design, my responsibilities with respect to the I-81 Interchange project included: participation in a quarterly design status meetings at which the project managers discussed all the projects that were under preliminary or final design in District 8-0. The I-81 Interchange project would have been discussed at these meetings in a summary fashion.
- 5. From November 1, 1997 to October 30, 1999, I was the District Design Services Engineer.
- 6. As the District Design Services Engineer, my responsibilities with respect to the I-81 Interchange project included: responsibility for the District's Environmental Unit and other service units. At this position, I participated in a quarterly design status meetings at which the project managers discussed all the projects that were under preliminary or final design in District 8-0. The I-81 Interchange project would have been discussed at these meetings in a summary fashion. At this position, I did not participate actively in the I-81 Interchange project, i.e., I was not involved in the PennDOT decision-making process for the project. I did not participate in any project specific meetings with regard to the I-81 Interchange project.
- 7. From February, 1992 to November 1997, I was the Planning and Programming Engineer.
- 8. As the Planning and Programming Engineer, my responsibilities with respect to the I-81 Interchange project included: responsibility for programming the Twelve Year Program on a bi-annual basis. At this position, I participated in a quarterly design status meetings at which the project managers discussed all the projects that were under preliminary or final design in District 8-0. The I-81 Interchange project would have been discussed at these meetings in a summary fashion. I did not participate in any project specific meetings with regard to

the I-81 Interchange project. At this position, I did not participate actively in the I-81 Interchange project, i.e., I was not involved in the PennDOT decision-making process for the project.

- From January 1986 to February ,1992 I was the Assistant District Traffic Engineer.
- 10. As the Assistant District Traffic Engineer, my responsibilities with respect to the I-81 Interchange project included: review preliminary traffic control plans.
- I have used the CICS e-mail system since February of I have no messages saved which relate to the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this 29th day of March, 2002.

Michael S. Gillespie, P.E.

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS (Judge Rambo) A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs,

v.

KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration,

Defendants,

and

BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania, Intervenor

DECLARATION OF LARRY M. KING

Larry M. King, declares and says:

- 1. I am the Deputy Secretary for Planning for the Pennsylvania Department of Transportation ("PennDOT"). I have held this position since December of 1991.
 - 2. I have never used the CICS e-mail system for any

"Exh. 5"

project.

3. I have never directed any of my staff to send any emails on the CICS e-mail system on my behalf for the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this ____ day of March, 2002.

Larry M. King

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS (Judge Rambo) : A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs, v. KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration, Defendants, and

DECLARATION OF CHRISTIE PERRY

Christie Perry, declares and says:

BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania,

Intervenor

1. I am the Environmental Manager for the Pennsylvania Department of Transportation's District 8-0 office. I have held this position since March 10, 1983.

1/Exh. 611

- 3. I have never used the CICS e-mail system for this project.
- 4. I have never directed any of my staff to send any emails on the CICS e-mail system on my behalf for the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this ____ day of March, 2002.

Mustre Perry Christie Perry

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. : Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 : JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS (Judge Rambo) : A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs, v. KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration, Defendants, and BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania,

DECLARATION OF JOHN L. RAUTZAHN, P.E.

John L. Rautzahn, P.E., declares and says:

Intervenor

1. From 1991 through June, 1999, I was the Assistant District Engineer for Design for the Pennsylvania Department of Transportation's District 8-0.

"Exh.7"

- 2. As Assistant District Engineer, my responsibilities with respect to the I-81 Interchange project included: active participation in meetings related to the design of the project.
- 3. Prior to being the Assistant District Engineer, my position was Project Development Engineer. At this position, I oversaw all planning and design projects performed within the district and by consultants. The I-81 Interchange project was one of the projects that I managed.
- 4. During my employment at District 8-0, I have never used the CICS e-mail system for any project.
- 5. During my employment at District 8-0, I have never directed any of my staff to send any e-mails on the CICS e-mail system on my behalf for the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this 27 day of March, 2002.

John L. Rautzahn, P.E

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS (Judge Rambo) A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs,

v.

KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration,

Defendants,

and

BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania, Intervenor

DECLARATION OF MICHAEL M. RYAN, P.E.

Michael M. Ryan, P.E., declares and says:

1. I am the Deputy Secretary for Highway Administration for the Pennsylvania Department of Transportation ("PennDOT"). I have officially held this position since 1995.

"Exh. 8"

- 2. My responsibilities with respect to the I-81 Interchange project included: occasionally attending meetings or participating in conference calls involving the District 8-0 staff, Bureau of Design staff, and/or consultants; and offering advise to District 8-0 staff.
- 3. I have never used the CICS e-mail system for any project.
- 4. I have never directed any of my staff to send any emails on the CICS e-mail system on my behalf for the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this day of March, 2002.

Michael M. Ryan, P.E.

GREENE/GUILFORD ENVIRONMENTAL : ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 : JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS : (Judge Rambo) A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs, v. KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration, Defendants, and BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania,

DECLARATION OF JAY W. SMITH, P.E.

Jay W. Smith, P.E., declares and says:

Intervenor

1. I am presently the Chief for the Highway Quality Assurance Division of the Pennsylvania Department of Transportation's Bureau of Design. I have held this position since August 1998. As Chief, I had no direct responsibilities

"Exh. 9"

with the I-81 Interchange Project other than supervising the Project Development Engineer involved in the Project.

- 2. From 1987 to 1998, I was a Project Development Engineer for the Highway Quality Assurance Division of the Bureau of Design. As the Project Development Engineer, my responsibilities with respect to the I-81 Interchange project included: The review of environmental documents, preliminary design and coordination activities between FHWA and the Department.
- 3. I have never used the CICS e-mail system for any project.
- 4. I have never directed any of my staff to send any emails on the CICS e-mail system on my behalf for the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this 22^{nd} day of March, 2002.

Jay W. Smith, P.E.

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 JOHN G. ENDERS, CHARLES F. : RAHAUSER, BETSY RAHAUSER, DOUGLAS : (Judge Rambo) A. WARNOCK, U.X. VAGNERINI, THOMAS : W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs, v. KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration, Defendants, and

BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania, Intervenor

DECLARATION OF JEFFREY P. WEAVER, P.E.

Jeffrey P. Weaver, P.E., declares and says:

1. I am the Assistant District Engineer for Design for the Pennsylvania Department of Transportation's District 8-0. I have held this position since October 30, 1999.

12xh.10"

- 2. As the Assistant District Engineer for Design, my responsibilities with respect to the I-81 Interchange project included: participation in meetings related to the design of the project and preparation for, and participation in, the ALCAB hearing for the project.
- 3. From July, 1999 to October 30, 1999, I was the District Design Portfolio Manager and I also acted part-time as the Assistant District Engineer for Design on a rotational basis with Michael S. Gillespie, P.E.
- 4. As the District Design Portfolio Manager and part-time Assistant District Engineer for Design, my responsibilities with respect to the I-81 Interchange project included: participation in project related meetings.
- 5. From July, 1997 to July, 1999, I was the District Project Development Engineer.
- 6. As the District Project Development Engineer, my responsibilities with respect to the I-81 Interchange project included: occasionally participated in project specific meetings for the I-81 Interchange project. At this position, I regularly participated in a quarterly design status meetings at which the project managers discussed all the projects that were under preliminary or final design in District 8-0. The I-81 Interchange project would have been discussed at these meetings in a summary fashion. I did not participate in a project specific meeting on the I-81 Interchange until February 25, 1998.
- 7. From December, 1991 to July, 1997, I was the District Design Services Engineer.
- 8. As the District Design Services Engineer, my responsibilities with respect to the I-81 Interchange project included: responsibility for the District's Environmental Unit. At this position, I regularly participated in a quarterly design status meetings at which the project managers discussed all the projects that were under preliminary or final design in District 8-0. The I-81 Interchange project would have been discussed at these meetings in a summary fashion. At this position, I did not participate actively in the I-81 Interchange project, i.e., I was not involved in the PennDOT decision-making process for the project.

- 9. From July, 1984 to December, 1991, I was the District Planning and Programming Engineer.
- 10. As the District Planning and Programming Engineer, my responsibilities with respect to the I-81 Interchange project included: coordination of the development of the overall Twelve Year Program for the District. At this position, I participated in a quarterly design status meetings at which the project managers discussed all the projects that were under preliminary or final design in District 8-0. The I-81 Interchange project would have been discussed at these meetings in a summary fashion. At this position, I did not participate actively in the I-81 Interchange project, i.e., I was not involved in the PennDOT decision-making process for the project.
- 11. I have used the CICS e-mail system from 1990 or earlier until December, 2001. From November 22, 1996 until April 27, 2001, I was in the habit of saving messages sent and received. I have saved 724 messages on the CICS e-mail system during this time period, none of which relate to the I-81 Interchange project located in Franklin County, Pennsylvania. Prior to November 22, 1996, I have two saved messages, neither one of which relates to the I-81 Interchange project. Subsequent to April 27, 2001, I have two saved messages, neither one of which relates to the I-81 Interchange project.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this 27 day of March, 2002.

Seffrey P Weaver, P.E.

GREENE/GUILFORD ENVIRONMENTAL ASSOCIATION, a non-profit Corporation incorporated under the laws of the Commonwealth of Pennsylvania, CITIZENS FOR PLANNED COMMUNITY GROWTH, an unincorporated association organized under the laws of the Commonwealth of CIVIL ACTION NO. Pennsylvania, PAUL B. AMBROSE, 1:CV-01-0910 JOHN G. ENDERS, CHARLES F. RAHAUSER, BETSY RAHAUSER, DOUGLAS (Judge Rambo) : A. WARNOCK, U.X. VAGNERINI, THOMAS W. BUNDY, STEPHEN P. BUCHER, ROGER J. ROBERTSON, JAMES A. STRITE, JR., DAVID A. GUTHRIE, Plaintiffs,

KEN WYKLE, Administrator, Federal Highway Administration, ROBERT GATZ, Federal Highway Administration,

v.

Defendants,

and

BRADLEY L. MALLORY, Secretary for The Department of Transportation, Commonwealth of Pennsylvania, Intervenor

DECLARATION OF ANTONIA C. ZAWISA

Antonia C. Zawisa, declares and says:

1. I am a District Environmental Specialist for the Pennsylvania Department of Transportation's Bureau of Design. I have held this position since March of 2000.

Exh. 11"

- 2. As District Environmental Specialist, my responsibilities with respect to the I-81 Interchange project included: participating as a reviewer of draft and final versions of the Farmland Assessment Report and handouts for the ALCAB Hearing and providing technical assistance during preparation for the ALCAB Hearing. I also attended the ALCAB Hearing.
- 3. From 1993 through March of 2000, I was an Environmental Planning Supervisor with PennDOT's Bureau of Environmental Quality.
- 4. As an Environmental Planning Supervisor, my responsibilities with respect to the I-81 Interchange project included: participating as project team member; attending some team meetings; providing technical assistance on issues regarding farmland impacts; and reviewing the Farmland Technical Basis Report.
- 5. I have never used the CICS e-mail system for any project.
- 6. I have never directed any of my staff to send any emails on the CICS e-mail system on my behalf for the I-81 Interchange project located in Franklin County, Pennsylvania.

I declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the foregoing is true and correct. Executed on this ____ day of March, 2002.

Antonia C. Zawisa.